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November 13, 2003

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TO: Interested Parties / Applicant

RE: Valmont Industries, Inc. / 039-17645-00237

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-AM.dot 9/16/03

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) Renewal OFFICE OF AIR QUALITY

Valmont Industries, Inc.
58027 Charlotte Avenue
Elkhart, Indiana 46517

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F039-14186-00237	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 3, 2002 Expiration Date: April 3, 2007

First Administrative Amendment: 039-16924-00237 issued on April 3, 2003

2nd Administrative Amendment No.: 039-17645-00237		Pages Modified: 24 & 25
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 13, 2003 Expiration Date: April 3, 2007	

SECTION A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-8-3(b)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
- A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]
- A.4 FESOP Applicability [326 IAC 2-8-2]
- A.5 Prior Permits Superseded

SECTION B GENERAL CONDITIONS

- B.1 Permit No Defense [IC 13]
- B.2 Definitions [326 IAC 2-8-1]
- B.3 Permit Term [326 IAC 2-8-4(2)]
- B.4 Enforceability [326 IAC 2-8-6]
- B.5 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3 (h)]
- B.6 Severability [326 IAC 2-8-4(4)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]
- B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]
- B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]
- B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]
- B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
- B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]
- B.14 Emergency Provisions [326 IAC 2-8-12]
- B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]
- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.17 Permit Renewal [326 IAC 2-8-3(h)]
- B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]
- B.19 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]
- B.20 Permit Revision Requirement [326 IAC 2-8-11.1]
- B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [I13-14-2-2]
- B.22 Transfer of Ownership or Operation [326 IAC 2-8-10]
- B.23 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]
- B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

SECTION C SOURCE OPERATION CONDITIONS**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

- C.1 Overall Source Limit [326 IAC 2-8]
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1][IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]
- C.7 Stack Height [326 IAC 1-7]
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

Testing Requirements [326 IAC 2-8-4(3)]

- C.9 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11]

- C.10 Compliance Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]
- C.13 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]
- C.14 Pressure Gauge Specifications

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) shotblaster, identified as EU-03, utilizing steel shot, with a maximum blast rate of 108 tons of steel shot per hour, exhausting through cartridge type filters identified as CD-03a and CD-03b, vented indoors; and
- (b) Two (2) powder coating booths, identified as EU-04A and EU-04B; EU-04B is also known as the small parts line. Booth EU-04A has a maximum coating rate of 21.33 pounds per hour and is equipped with three (3) electrostatic applicators, only two of which can be used at any one time, exhausting through two (2) cartridge type dust collectors identified as CD-04a and CD-04b and venting back into the system as makeup air. Booth EU-04B has a maximum coating rate of 10.67 pounds per hour and is equipped with one (1) electrostatic applicator, exhausting through one (1) cartridge type dust collector identified as CD-04c and venting back into the system as make up air.
- (c) One (1) powder coating booth, identified as EU-05, with a maximum coating rate of 22.53 pounds per hour, exhausting through two (2) cartridge type dust collectors identified as CD-05a and CD-05b and venting back into the building.
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, the particulate matter from the one (1) shotblaster, identified as EU-03 shall be limited to 13.83 pounds per hour, based on a process weight rate of 108 tons of steel shot per hour.
- (b) Pursuant to 326 IAC 6-3-2, the particulate matter from the two (2) powder coating booths, identified as EU-04A, EU-04B, and EU-05 shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.2 FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), PM10 from the one (1) shotblaster, identified as EU-03 shall be limited to 7.43 pounds per hour, which is equivalent to 32.55 tons of PM10 per year.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and its control device.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.4 Particulate Matter (PM)

- (a) In order to comply with D.1.1(a), the cartridge filters for PM control shall be in operation at all times when the one (1) shotblaster, identified as EU-03 is in operation.
- (b) In order to comply with D.1.1(b), the cartridge type dust collectors shall be in operation at all times when the three (3) powder coating booths, identified as EU-04A, EU-04B, and EU-05 are in operation.

D.1.5 Parametric Monitoring

The Permittee shall record the total static pressure drop once per shift across each cartridge filter unit, CD-03a and CD-03b controlling the one (1) shotblaster (EU-03) when the one (1) shotblaster (EU-03) is in operation and venting directly to the atmosphere. When for any one reading, the pressure drop across cartridge filter unit CD-03a is outside the normal range of 2.0 to 8.0 inches of water or a range established during the latest stack test and the pressure drop across filter unit CD-03b is outside the normal range of 0.5 and 2.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.6 Broken or Failed Cartridge Filter Detection

In the event that cartridge filter failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment cartridge filters, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.1.7 Cartridge Filter Inspections

An inspection shall be performed each calendar quarter of all cartridge filters controlling the one (1) shotblaster (EU-03) when venting to the atmosphere. A cartridge filter inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective cartridge filters shall be replaced.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain the following:

- (1) Once per shift records of the following operational parameters during normal operation when venting directly to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for an Administrative Amendment to A Federally Enforceable State Operating Permit (FESOP)

Source Name:	Valmont Industries, Inc.
Source Location:	58027 Charlotte Avenue, Elkhart, Indiana 46517
County:	Elkhart
SIC Code:	3499
Operation Permit No:	F039-14186-00237
Permit Modification No.:	AA F039-17645-00237
Permit Reviewer:	Cynthia Bymaster

The Office of Air Quality (OAQ) has reviewed the petition for Valmont Industries, Inc., relating to its fabricated metal products facility which manufactures light poles.

History

Valmont Industries was issued a FESOP renewal permit (F039-14186-00237) on April 3, 2002. Valmont applied for a modification of the permit on March 17, 2003 (Administrative Amendment 039-16924-00237). This application was to add 1-powder coating booth and 1-buffing unit. This modification added emission units of the same type that were already permitted and only required an Administrative Amendment. The First Administrative Amendment was issued on April 3, 2003. Valmont Industries, Inc., petitioned for a review of the First Administrative Amendment on April 22, 2003. Its petition was filed in the Office of Environmental Adjudication under Cause Number 03-A-J-3056. This Second Administrative Amendment shows the changes made to the permit in response to the petition for review.

The appeal requests follow with the deleted language in the permit appearing as ~~strikeouts~~, and the new or revised language appearing underlined in the response. There were no changes to the Table of Contents. Pages affected by this amendment have had a 'B' added to the page number to indicate this is the second modification to the permit.

Appeal Item 1: [FESOP AA F039-16924-00237, Cause No. 03-A-J-3056]

Valmont Industries, Inc., objects to condition D.1.5 (Parametric Monitoring). The condition states that the total static pressure drop shall be recorded, once per shift when the shotblaster is in operation and venting indoors. Valmont Industries, Inc., requests that parametric monitoring apply when venting to the atmosphere.

Response 1: IDEM OAQ has reviewed the requested changes to conditions D.1.5 (Parametric Monitoring). Revisions have been made to Condition D.1.5 as well as D.1.8 of the FESOP to address the petitioner's objection as follows:

D.1.5 Parametric Monitoring

The Permittee shall record the total static pressure drop once per shift across each cartridge filter unit, CD-03a and CD-03b controlling the one (1) shotblaster (EU-03) when the one (1) shotblaster (EU-03) is in operation and venting ~~indoors~~ directly to the atmosphere. When for any one reading, the pressure drop across cartridge filter unit CD-03a is outside the normal range of 2.0 to 8.0 inches of water or a range established during the latest stack test and the pressure drop across filter unit CD-03b is outside the normal range of 0.5 and 2.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-

Compliance Response Plan - Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain the following:
 - (1) Once per shift records of the following operational parameters during normal operation when venting directly to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle operation.
 - (2) Documentation of the dates vents are redirected.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Conclusion

The operation of this fabricating metal products facility which manufactures light poles shall be subject to the conditions of the attached Administrative Amendment FESOP No.: F039-17645-00237.